



United States  
Department of  
Agriculture

Forest  
Service

Alaska Region

P.O. Box 21628  
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**US Department of Energy**

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**Electricity Delivery and  
Energy Reliability**  
Mr. Christopher Lawrence  
Office of Electricity Delivery and Energy Reliability (OE-20)  
U.S. Department of Energy  
1000 Independence Avenue SW  
Washington, DC 20585

**COMMENTS ON APPLICATION FOR PRESIDENTIAL PERMIT FOR  
TRANSMISSION LINE ACROSS U.S. BORDER WITH CANADA, OE No. PP-387**

**SOULE RIVER HYDROELECTRIC PROJECT, FERC No. 13528-001**

Dear Mr. Lawrence:

Thank you for the opportunity to comment on Soule Hydro, LLC's (Soule Hydro) application for a Presidential permit to construct, operate, and connect an electric transmission line across the United States border with Canada for the Soule River Hydroelectric Project, P-13528. The transmission line would originate on the Soule River, within the Ketchikan-Misty Fiords Ranger District, Tongass National Forest, Alaska Region.

Forest Service staff has had many conversations with AP&T and with the Federal Energy Regulatory Commission (FERC) about this project and have filed numerous comments. We filed lengthy review comments for the Draft License Application and Preliminary Draft Environment Assessment and filed preliminary 4(e) terms and conditions. Our position has remained the same for several years: the proposed hydroelectric project is inconsistent with land use direction in the Tongass Land and Resource Management Plan (Forest Plan).

In both the 1997 and the 2008 Forest Plans, the Soule River drainage was assigned to a Remote Recreation land use designation. Any project to be developed in the Soule River area must be consistent with both Remote Recreation management direction and Forest-wide standards and guidelines, as described in the Forest Plan. The proposed Soule River Hydroelectric Project is inconsistent with most of the Remote Recreation goals, objectives and desired conditions, and with many of the Forest-wide standards and guidelines.

In addition, the hydroelectric project area is within an Inventoried Roadless Area and may pose issues that require further review.



Mr. Christopher Lawrence

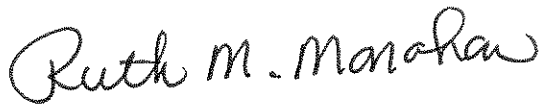
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We continue to question the viability of the project and are reviewing the latest feasibility information supplied by AP&T.

Based on the information and findings to date, the Forest Service is not considering amending the Forest Plan to accommodate the Soule River Hydroelectric Project. However, the Tongass NF is in the midst of a 5-year review of the Forest Plan and has received numerous comments related to energy development and land use allocations. Our review of these comments is ongoing.

Please contact Barbara Stanley, Regional Hydropower Coordinator, at (907) 228-6262 if you have any questions.

Sincerely,



BETH G. PENDLETON  
Regional Forester

cc: Mr. Robert S. Grimm